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9 UNITED STATES BANKRUPTCY COURT
 10 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
 11

12 In re

Case No. 19-30088-DM

13 PG&E Corporation,

Chapter 11

Lead Case, Jointly Administered

14 and

**NOTICE OF HEARING ON MOTION
 FOR RELIEF FROM STAY, OR
 ALTERNATIVELY, FOR ABSTENTION**

15 PACIFIC GAS AND ELECTRIC
 16 COMPANY,

Debtors.

Date: June 24, 2020

Time: 10:00 a.m.

Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102

Judge: Hon. Dennis Montali

17 ☐ Affects PG&E Corporation
 18 ☐ Affects Pacific Gas and Electric Company
 19 ☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
 No. 19-30088-DM,

Objection deadline: June 19, 2020
 4:00 p.m. (Pacific Time)

20 TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED
 21 PARTIES:

22 PLEASE TAKE NOTICE that a hearing on the Motion for Relief From Stay, Or
 23 Alternatively, For Abstention ("the Motion") filed by Dwyane Little ("Plaintiff") will be heard by
 24 the Honorable Dennis Montali on June 24, 2020 at 10:00 a.m.

25 The hearing will not be conducted in the presiding judge's courtroom but instead will be
 26 conducted by telephone or video. All interested parties should consult the Bankruptcy Court's
 27 website at www.canb.uscourts.gov for information about court operations during the COVID-19
 28

1 pandemic. The Bankruptcy Court's website provides information regarding how to arrange a
2 telephonic or video appearance. If you have any questions regarding how to appear at a court
3 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live
4 Chat feature on the Bankruptcy Court's website.

5 In the Motion, Plaintiff requests that the Bankruptcy Court (a) grant relief from stay to
6 allow Plaintiff's pending state court tort claims to be liquidated in the extant state court
7 proceeding, or alternatively, (b) abstain from adjudicating Plaintiff's claims against Pacific Gas &
8 Electric Company ("Debtor") and the other defendants named in Yolo County Superior Court
9 Case No. CV18-2183 ("the Lawsuit"). Plaintiff's claims arise out of and are based on Age, Race,
10 and Disability Discrimination, Unlawful Retaliation, Wrongful Termination, and others. Plaintiff
11 acknowledges actual payment and collection of any eventual putative judgment will be as
12 proscribed by the terms of PG&E's chapter 11 plan and ultimate confirmation order.

13 The Motion is brought pursuant to 28 USC § 1334(c)(1) and 11 USC § 362(d)(1) for cause.
14 The Motion is based on this Notice, the Motion, the Declaration of Christopher Whelan filed in
15 support of the Motion and upon all other pleadings and papers on file herein and such oral and
16 documentary evidence as may be presented at the hearing on the Motion.

17 PLEASE TAKE FURTHER NOTICE that the Debtor is advised to appear personally or by
18 counsel at the preliminary hearing as provided in Local Rule 4001-1(a) and that failure to so
19 appear may result in the Court granting the relief requested without further hearing, including the
20 lifting of the automatic stay to allow Plaintiff to pursue the litigation in state court, including
21 pretrial proceedings, trial, post-trial motions and any appellate proceedings in or in connection
22 with the Lawsuit.

23 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion must
24 be in writing, filed with the Bankruptcy Court, and served on the counsel for Plaintiffs at the
25 above-referenced address so as to be received by **no later than 4:00 p.m. (Pacific Time) on**
26 **June 19, 2020**. Any opposition or response must be filed and served on all "Standard Parties" as
27 defined in the Amended Order Implementing Certain Notice and Case Management Procedures
28 entered by the Court on March 27, 2019 ("Case Management Order"). **Any relief requested in**

1 the Motion may be granted without a hearing if no opposition is filed a served in
2 accordance with the Case Management Order. In deciding the Motion, the Court may
3 consider any other document filed in these Chapter 11 Cases and related Adversary Proceedings.

4 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers
5 can be viewed and/or obtained: (i) by accessing the Court's website at
6 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
7 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtor's notice and claims agent, Prime
8 Clerk LLC, at <https://restrucuring.primeclerk.com/pge> or by calling (844) 339-4217 for U.S. based
9 parties; or (929) 333-8977 for International parties or by email at: pgeinfo@primeclerk.com. Note
10 that a PACER password is needed to access documents on the Bankruptcy Court's website.

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13 DATED: June 3, 2020

DOWNEY BRAND LLP

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15 By: /s/ Jamie P. Dreher
16 JAMIE P. DREHER
17 Attorneys for Dwyane Little
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